

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

ORIENTAL TRADING COMPANY, INC.,

Plaintiff,

v.

DENOVO VENTURES, LLC

Defendant.

Civil Action Case No. 8:22-cv-00078

DENOVO VENTURES, LLC's  
MOTION TO DISMISS  
PURSUANT TO FED. R. CIV. P.  
12(b)(2) or alternatively, MOTION  
TO TRANSFER VENUE  
PURSUANT TO 28 USC §  
1406(a) OR 28 USC § 1404(a)

Gordon Rees Scully Mansukhani, LLP  
301 South 13<sup>th</sup> Street, Suite 400  
Lincoln, NE 68508

COMES NOW DENOVO VENTURES, LLC ("**Denovo**"), a Colorado limited liability corporation, and by and through its counsel of record moves this Court for:

(A) An Order dismissing ORIENTAL TRADING COMPANY, INC.'s ("**OTC**") Complaint against Denovo for lack of personal jurisdiction and/or improper venue pursuant to Federal Rule of Civil Procedure 12(b)(2) and 12(b)(3), respectively;

(B) Or, alternatively, if it is determined that the case has laid venue in the wrong district, but it be in the interest of justice to transfer this case, then an Order transferring this case to the United States District Court for the District of Colorado pursuant to 28 USC § 1406(a);

(C) Or, alternatively, for the convenience of parties and witnesses, and in the interest of justice, then an Order transferring this case to the United States District Court for the District of Colorado pursuant to 28 USC § 1404(a).

In support of the above, Denovo has concurrently filed a brief in support of this motion and the Affidavit of David MacGrandle.

Wherefore, Denovo respectfully requests this Court dismiss the Complaint, or,

alternatively, transfer the suit to the District of Colorado.

Respectfully submitted,

Dated: May 3, 2022

By s/ A. Victor Rawl, Jr.  
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**CERTIFICATE OF SERVICE**

I hereby certify that on May 3, 2022, the above and foregoing was electronically filed with the Clerk of the Court using the CM/ECF system, which will send notifications of such filing to the following:

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Date: May 3, 2022

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